



dispositive of all claims. Defendant also requests that the Court stay the deadlines for the parties' Initial Disclosures and Joint Preliminary Report and Discovery Plan until thirty (30) days after the Court rules on Defendant's Motion to Dismiss Plaintiff's Complaint, if such ruling is not dispositive of all claims.

Respectfully submitted this 3rd day of August, 2023.

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**CERTIFICATE OF COMPLIANCE**

The undersigned counsel hereby certifies that this **DEFENDANT’S MOTION TO STAY THE DEADLINES FOR THE PARTIES’ RULE 26F EARLY PLANNING CONFERENCE, INITIAL DISCLOSURES, AND JOINT PRELIMINARY REPORT AND DISCOVERY PLAN** complies with the type-volume limitations set forth in Rule 5.1 of the Local Rules of the United States District Court for the Northern District of Georgia and has been typed in Times New Roman 14 count.

/s/ Toni J. Read  
Toni J. Read